

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

SHERMAN HUNT, on behalf of himself and  
all others similarly situated,

Plaintiff,

vs.

ICF TECHNOLOGY INC. d/b/a ECHS.NET,

Defendant.

Case No. 24-cv-1679-JLR

**STIPULATED MOTION AND  
[PROPOSED] ORDER TO MODIFY  
BRIEFING SCHEDULE ON  
DEFENDANT'S MOTION TO DISMISS  
AMENDED COMPLAINT**

**NOTE ON MOTION CALENDAR:  
DECEMBER 13, 2024**

**STIPULATED MOTION**

Plaintiff Sherman Hunt and Defendant ICF Technology, Inc. d/b/a ESHST.net, by and through their respective counsel of record, respectfully file this Stipulated Motion to Modify Briefing Schedule on Defendant's Motion to Dismiss Plaintiff's Amended Complaint as follows:

WHEREAS, on September 6, 2024, Plaintiff filed his Class Action Complaint in the Superior Court of King County;

WHEREAS, on October 15, 2024, Defendant removed the matter to this Court (Dkt. 1);

WHEREAS, on October 22, 2024, Defendant filed a Motion to Dismiss Plaintiff's Complaint or, Alternatively, Strike Certain Class Allegations (Dkt. 7);

STIPULATED MOTION AND [PROPOSED] ORDER  
TO MODIFY BRIEFING SCHEDULE ON  
DEFENDANT'S MOTION TO DISMISS AMENDED  
COMPLAINT - 1  
Case No. 2:24-cv-01679-JLR

**THE HARBOR LAW GROUP**  
8811 N. Harborview Drive, Suite B  
Gig Harbor WA 98332-2174  
(253) 358-2215

WHEREAS, on November 12, 2024, Plaintiff amended his Class Action Complaint (Dkt. 11);

WHEREAS, on November 26, 2024, Defendant filed a Motion to Dismiss Plaintiff's Amended Complaint or, Alternatively, to Strike Certain Class Allegations (the "Motion") (Dkt. 13);

WHEREAS, Plaintiff's response to the Motion is due on December 17, 2024;

WHEREAS, Defendant's reply in support of the Motion is due on December 24, 2024;

WHEREAS, the parties met and conferred regarding the allegations in the Amended Complaint and are in the process of discussing a potential resolution and/or narrowing the issues in dispute;

The parties therefore stipulate and agree that good cause exists for this extension, and jointly request that the Court issue an Order confirming the following modified briefing schedule on Defendant's Motion:

Event	Deadline
Deadline for Plaintiff to file response to Motion	January 6, 2025
Deadline for Defendant to file reply in support of Motion	January 13, 2025

Dated this 13<sup>th</sup> day of December 2024.

**HARBOR LAW GROUP**

/s/ Kira M. Rubel

Kira M. Rubel, WSBA No. 51691  
8811 N. Harborview Drive, Suite B  
Gig Harbor, Washington 98332  
Telephone: (253) 358-2215  
kira@theharborlawgroup.com

Andrew J. Shamis  
(to be admitted *pro hac vice*)  
**SHAMIS & GENTILE, P.A.**  
14 NE 1st Avenue, Suite 705  
Miami, Florida 33132

**LANE POWELL PC**

/s/ Aaron Schaer

Jeffrey M. Odom, WSBA No. 36168  
Erin M. Wilson, WSBA No. 42454  
Aaron Schaer, WSBA No. 52122  
1420 Fifth Avenue, Suite 4200  
P.O. Box 91302  
Seattle, Washington 98111-9402  
Telephone: (206) 223-7000  
odomj@lanepowell.com  
wilsonem@lanepowell.com  
schaera@lanepowell.com

STIPULATED MOTION AND ~~PROPOSED~~ ORDER  
TO MODIFY BRIEFING SCHEDULE ON  
DEFENDANT'S MOTION TO DISMISS AMENDED  
COMPLAINT - 2  
Case No. 2:24-cv-01679-JLR

**THE HARBOR LAW GROUP**  
8811 N. Harborview Drive, Suite B  
Gig Harbor WA 98332-2174  
(253) 358-2215

1 Telephone: 305-479-2299  
2 ashamis@shamisgentile.com

*Attorneys for Defendant ICF Technology,  
Inc. d/b/a ECHST.net*

3 Sophia Goren Gold  
4 (to be admitted *pro hac vice*)  
5 **KALIEL GOLD PLLC**  
6 490 43<sup>rd</sup> Street, No. 122  
7 Oakland, California 94609  
8 Telephone: (202) 350-4783  
9 sgold@kalielgold.com

10 Jeffrey D. Kaliei  
11 (to be admitted *pro hac vice*)  
12 Amanda J. Rosenberg (to be admitted *pro*  
13 *hac vice*)  
14 **KALIEL GOLD PLLC**  
15 1100 15<sup>th</sup> Street NW 4<sup>th</sup> Floor  
16 Washington, D.C. 20005  
17 Telephone: (202) 350-4783  
18 jkaliel@kalielgold.com  
19 arosenberg@kalielgold.com

20 Scott Edelsberg  
21 (to be admitted *pro hac vice*)  
22 **EDELSBERG LAW, P.A.**  
23 1925 Century Park East, Suite 1700  
24 Los Angeles, California 90067  
25 Telephone: (305) 975-3320  
26 scott@edelsberglaw.com

*Attorneys for Plaintiff*

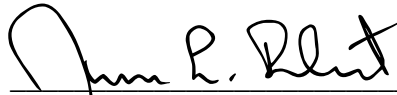
I certify that this memorandum contains 249 words, in compliance with the Local Civil Rules.

**[PROPOSED] ORDER**

Based upon the foregoing Stipulated Motion, IT IS SO ORDERED: that the modified briefing schedule on Defendant's Motion is confirmed as follows:

Event	Deadline
Deadline for Plaintiff to file response to Motion	January 6, 2025
Deadline for Defendant to file reply in support of Motion	January 13, 2025

IT IS SO ORDERED this 16th day of December, 2024



James L. Robart  
United States District Judge